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Attorneys for Defendants,

California Department of Corrections, Edward S.

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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

KATHY DEOCAMPO,

Plaintiff,

v.

CALIFORNIA DEPARTMENT OF  
CORRECTIONS, EDWARD S. ALAMEIDA,  
JR., JEANNE S. WOODFORD, AND  
DOES 1-25 Inclusive,

Defendants.

Case No.: C 04-3018 MMC

STIPULATION REQUESTING  
ADDITIONAL 30-DAY  
CONTINUANCE OF CASE  
MANAGEMENT CONFERENCE  
AND ~~PROPOSED~~ ORDER

Date: May 20, 2005

Time: 10:30 a.m.

Courtroom: 7

Judge: Honorable Maxine M. Chesney

Pursuant to the Court's Order and Civil L.R. 16-9, the parties jointly submit this Stipulation requesting a 30-day continuance of the Case Management Conference on the ground that the parties are in the process of negotiating in good faith to reach a global settlement of all of plaintiff's claims.

**DESCRIPTION OF THE CASE AND PROCEDURAL HISTORY**

Plaintiff, Kathy DeoCampo, is an employee of the California Department of Corrections in the job position of Correctional Case Records Analyst at San Quentin State Prison. She filed this instant lawsuit on July 26, 2004, alleging retaliation under Title VII, 42 U.S.C. section 2000(e), retaliation for First Amendment activities under 42 U.S.C. section 1983, and *pendent* claims under California Government Code section 12940, *et seq.* Defendants answered the complaint on August 18, 2004.

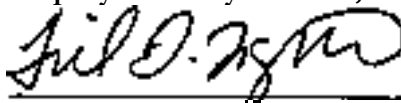
1 Plaintiff also filed related Workers' Compensation claims that are pending before the California  
 2 Workers' Compensation Appeals Board. Because the parties agreed to enter into settlement  
 3 negotiations to attempt to reach a global settlement of all of plaintiff's claims, the parties requested  
 4 that this Court continue the previously scheduled Case Management Conference that had been set  
 5 for April 15, 2005. The Court issued an order continuing the Case Management Conference to May  
 6 20, 2005. The parties met on May 10, 2005 to discuss possible terms for a global settlement of all  
 7 of plaintiff's claims, and they are currently in good faith negotiations to attempt to reach this global  
 8 settlement.

9  
 10 **STIPULATION**

11 Given that the parties are currently engaged in good faith negotiations following their May 10,  
 12 2005 settlement meeting, the parties respectfully request that this Court grant an additional 30-day  
 13 continuance of the Case Management Conference.

14 **RESPECTFULLY SUBMITTED,**

15  
 16 **BILL LOCKYER, Attorney General**  
 17 **of the State of California,**  
**MIGUEL A. NERI, Supervising**  
**Deputy Attorney General,**

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19 **FIEL D. TIGNO**  
 20 **Deputy Attorney General**  
**ATTORNEY FOR DEFENDANTS**

21  
 22  
 23  
 24 **Dated:** 5/13/05

25 **THE SCOTT LAW FIRM**

26   
 27 **JOHN HOUSTON SCOTT**  
 28 **ATTORNEY FOR PLAINTIFF**

**[PROPOSED] ORDER**

Having considered the parties' stipulation and finding good cause in support thereof, the stipulation is hereby approved and the Case Management Conference set for May 20, 2005 shall be continued to 30 days to June 24, 2005. A joint case management conference statement shall be filed no later than 7 days before the new Case Management Conference.

IT IS SO ORDERED.

Dated: May 16, 2005

/s/ Maxine M. Chesney

The Honorable Maxine M. Chesney  
United States District Judge